

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KOY ROBINSON,

Plaintiff,

-against-

THE CITY OF NEW YORK,

Defendant.

FILED
AUG 25 2005
ECF CASE
COMPLAINT
USDC WP SDNY
PLAINTIFF DEMANDS
A JURY TRIAL

05 CIV. 7512
JUDGE CROTTY

Plaintiff KOY ROBINSON, by his attorneys, GOODSTEIN & WEST, ESQS.,
complaining of defendant THE CITY OF NEW YORK (hereinafter "NYC"), alleges as follows:

1. This is an action for compensatory and punitive damages on behalf of plaintiff. This suit is authorized pursuant to Title VII of the Civil Rights Act of 1964 (42 USC §2000e et seq.), the New York State Human Rights Law (NYS Executive Law §290 et seq.) and the New York City Human Rights Law Local Law 59 of 1986 as amended by Local Rule 39 of 1991 §8-107.

Jurisdiction of this court is invoked pursuant to 42 USC §2000 e-5, 28 USC §§1331, 1343 and under the principle of pendent jurisdiction. Jurisdiction of this court is invoked to secure protection of, and redress deprivation of, rights secured by Title VII of the Civil Rights Act of 1964 (42 USC §2000e et seq.), providing for equitable and legal relief against discrimination in employment, because of race, and/or color; and both New York State Executive Law §290 et seq. (Human Rights Law) and the New York City Human Rights Law Local Law 59 of 1986 as amended by Local Rule 39 of 1991 §8-107, prohibiting discrimination in employment, because of race and/or color.